

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC., et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Civil Action No. BAH-25-337

**SUPPLEMENTAL DECLARATION OF OMAR GONZALEZ-PAGAN IN SUPPORT OF
PLAINTIFFS' EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER**

I, Omar Gonzalez-Pagan, hereby declare and state:

1. I am over 18 years of age, of sound mind, and fully capable of making this declaration. I have personal knowledge of the facts set forth in this declaration, they are true and correct, and I would be able to testify about these facts if I were called as a witness at a hearing or trial.

2. I am a licensed attorney in the Commonwealth of Massachusetts and the State of New York. I am Senior Counsel and Health Care Strategist at Lambda Legal, and counsel for Plaintiffs in this action.

3. I submit this supplemental declaration in support of Plaintiffs' Emergency Motion for a Temporary Restraining Order.

4. On January 31, 2025, St. John's Community Health, one of the largest free and reduced-cost providers in Los Angeles, California, reported that as a result of President Donald Trump's executive orders targeting transgender people, the Centers for Disease Control and Prevention ("CDC") terminated a \$1.6 million grant that was supposed to support its transgender health and social services program. *See Kristen Hwang, LA Clinics Lose Funding for Transgender*

Health Care as Trump Executive Orders Take Hold, CALMATTERS (Feb. 4, 2025), <https://calmatters.org/health/2025/02/trump-executive-order-transgender-health/>; Alice Miranda Ollstein et al., *Safety Net Clinics Hit by Funding Freezes, Threats over DEI and Gender*, POLITICOPRO (Feb. 6, 2025), <https://subscriber.politicopro.com/article/2025/02/safety-net-clinics-hit-by-funding-freezes-threats-over-dei-and-gender-00202858/>. **Exhibits R-1** and **R-2** are true and correct copies of the news reports of that grant termination.

5. Since the executive orders were issued, the National Institutes of Health (“NIH”) appears to have defunded or suspended numerous research studies and health services for transgender people. Kristi Gamarel, an associate professor of health behavior and health equity at the University of Michigan School of Public Health, was coordinating a multicity study evaluating programs to prevent HIV in transgender youth of color. According to news reporting, NIH suspended review of the study on January 31, 2025 in the wake of the executive orders. *See* Fenit Nirappil, *Trans Health, Research Programs Ordered to Stop by Trump Administration*, WASH. POST (Feb. 4, 2025), <https://washingtonpost.com/health/2025/02/04/trump-order-transgender-health-research-programs/>. **Exhibit R-3** is a true and correct copy of a news report of the NIH’s suspension of the study.

6. Mandi Pratt-Chapman, an associate director for patient-centered initiatives and health equity at the George Washington University Cancer Center, was involved in a study that examined the best ways to collect data on sexual orientation and gender identity of cancer patients to reduce disparities in care. That study similarly appears to have been suspended or terminated. *Id.*

7. Since Plaintiffs filed their complaint and motion for a temporary restraining order on February 4 and 5, 2025, respectively, additional hospitals have cut off necessary care for transgender patients under age nineteen.

8. On February 5, 2025, Children's Hospital of Colorado sent a letter to patients and their families of the TRUE Center for Gender Diversity, announcing that in light of the January 28, 2025 Denial of Care Order (Executive Order 14,187), it "will transition its model of gender affirming care" and cease offering hormone-based care "for any patient under 19 years of age" because the executive order "threatens Children's Hospital Colorado's ability to provide care for the many children who rely on us." Children's Hospital of Colorado further stated, "We recognize the grief and anxiety that these changes will bring for the patients and families who have shown unwavering dedication and commitment to supporting children in embracing their true selves." **Exhibit R-4** is a true and correct redacted copy of this notice.

9. In addition, several hospitals have stopped initiating care for new patients. On February 4, 2025, Children's Hospital Los Angeles issued a statement that it was pausing the initiation of hormonal therapy due to the executive orders. *See Emily Alpert Reyes, Children's Hospital L.A. Stops Initiating Hormonal Therapy for Transgender Patients Under 19, L.A. TIMES* (Feb. 4, 2025), <https://www.latimes.com/california/story/2025-02-04/childrens-hospital-to-stop-initiating-hormonal-therapy-for-trans-patients-under-19/>. **Exhibit R-5** is a true and correct copy of the news report covering this denial of care.

10. On February 7, 2025, Corewell Health became the first medical system in Michigan to announce that it would be officially "limiting gender-affirming care for minor patients." In a statement provided to the Detroit Free Press, Corewell stated that they would not be "beginning

any new hormone therapy regimens for minor patients seeking gender affirming care.” **Exhibit R-6** is a true and correct copy of the news report covering this denial of care.

11. In Arizona, multiple providers have confirmed they are restricting gender affirming care, including medications, due to the Executive Orders. On February 10, 2025, Children’s Hospital of Phoenix sent an email to patients informing them that “after careful review of the executive order issued on January 28, 2025, surrounding gender-affirming medical care for children under the age of 19,” “Phoenix Children’s is indefinitely pausing gender-affirming medical care, specifically puberty blocking and gender-affirming hormonal therapy.” **Exhibit R-7** is a true and accurate copy of that notice.

12. On February 11, 2025, another Phoenix-based provider confirmed it was no longer providing certain gender affirming care services to patients under the age of 19. Prisma Community Care in Phoenix, Arizona—one of America’s oldest and largest LGBTQ+ clinics—stated, “Due to President Trump’s executive order,” it was “no longer able to provide gender-affirming hormone therapy to patients under 19.” See Joseph Darius Jaafari, *Phoenix-Based LGBTQ+ Clinic Stops Providing Gender Affirming Care to Minors*, TUSCON SENTINEL (Feb. 11, 2025), https://www.tucsonsentinel.com/local/report/021125_phx_gender_care/phoenix-based-lgbtq-clinic-stops-providing-gender-affirming-care-minors/. **Exhibit R-8** is a true and correct copy of a news report reporting on this termination of care.

13. Upon information and belief, on January 31, 2025, as part of its implementation of Executive Order 14,168 (the “Gender Identity Order”), the Centers for Disease Control and Prevention (“CDC”) sent a letter to a health center in California terminating a federal grant. The letter stated, in part, that the recipient “must immediately terminate, to the maximum extent, all programs, personnel, activities, or contracts promoting or inculcating gender ideology at every

level and activity.” **Exhibit R-9** is a true and accurate copy of the notice that accompanied that grant termination.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 12th day of February, 2025.

/s/ Omar Gonzalez-Pagan
Omar Gonzalez-Pagan